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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Alexis Wakefield,

Plaintiff,

v.

Jessica Saldana and Ronnie J. Saldana; DOES  
1 through 10; ROE CORPORATIONS 11  
through 20, inclusive,  
Defendant.

Case No. 2:22-cv-00402

ORDER GRANTING

**Proposed Stipulation to Continue  
Discovery Deadlines (Rebuttal Expert  
Reports)**

**(Second Request)**

Plaintiff, ALEXIS WAKEFIELD, by and through her attorney of record, BRIAN K. HARRIS, ESQ. with the law firm of HARRIS & HARRIS INJURY LAWYERS, and Defendants, JESSICA SALDANA and RONNIE J. SALDANA, by and through their attorneys of record MICHAEL A. PINTAR, ESQ. with the law firm of MCCORMICK, BARSTOW, SHEPPARD, WAYTE & CARRUTH, hereby files this Stipulation and Order to Continue Discovery Deadline (Rebuttal Expert Reports) (Second Request), specifically seeking to extend the due date for the rebuttal expert reports by one week.

IT IS HEREBY STIPULATED AND AGREED between the parties to extend the rebuttal expert reports deadline of November 2, 2022. In accordance with Local Rule 26-4, the parties state as follows:

**A. Discovery Completed**

Plaintiff served her Initial Disclosures on May 4, 2022 and Defendants served their Initial Disclosures on May 4, 2022. The parties have supplemented these responses appropriately as new information becomes available. Plaintiff has propounded interrogatories, requests for admissions and requests for production of documents to

Defendants. Defendants and propounded interrogatories and requests for production of documents to Plaintiff. Defendant has taken the deposition of Plaintiff on July 12, 2022. Initial expert reports were served on October 3, 2022.

#### **B. Discovery Remaining**

The parties intend to depose experts that were disclosed as well as the Defendants depositions.

#### **C. Need for Extension of Discovery Plan**

The parties have been working diligently throughout the discovery process. As indicated above, the parties have begun discovery efforts in terms of disclosures, written discovery, and depositions. Plaintiff's request additional time for their expert rebuttal report by one week.

#### **D. Proposed New Discovery Schedule**

**1. Discovery Cutoff date:** Discovery cutoff currently scheduled for **November 30, 2022**, no change.

**2. Expert Disclosures:** Initial expert disclosures were served on October 3, 2022.

**3. Rebuttal Disclosures:** Rebuttal Disclosures are due on **November 2, 2022**, shall be served on **November 7, 2022**.

**4. Dispositive Motions:** Dispositive motions currently due **December 30, 2022**, no change.

**5. Pretrial Order:** A Joint Pretrial Order shall be filed by **January 30, 2023**, which is 30 days after the deadline for filing dispositive motions. However, if any dispositive motions are filed, then the Joint Pretrial order shall be due 30 days after decision on such

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1 motion(s). Disclosures under Fed. R. Civ. P. 26(a)(3) and any objections thereto shall be  
2 included in the Joint Pretrial order.

3 Respectfully submitted this 31st day of October, 2022.

4 HARRIS & HARRIS LAWYERS

MCCORMICK, BARSTOW, SHEPPARD,  
WAYTE & CARRUTH, LLP

5  
6 /s/ Brian K. Harris  
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8 *Attorneys for Plaintiff Alexis Wakefield*

/s/ Michael A. Pintar  
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9 *Attorneys for Defendant Jessica & Ronnie*  
10 *Saldana*

11 **IT IS SO ORDERED:**

12 DATED this 3rd day of November, 2022.

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14 **UNITED STATES MAGISTRATE JUDGE**